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July 22, 2024

VIA ECF

Hon. Miroslav Lovric
U.S. Magistrate Judge
U.S. District Court
Northern District of New York
Binghamton U.S. Courthouse
15 Henry St.
Binghamton, NY 13901

Re: *Honeywell Int'l Inc. v. Buckeye Partners, L.P. et al.*, Case No. 5:18-cv-00646-FJS-ML; *Honeywell Int'l Inc. v. Energy Transfer (R&M), LLC*, No. 5:18-CV-1176 (FJS/ML); *Honeywell Int'l Inc. v. CITGO Petroleum Corp.*, No. 5:19-CV-1219 (FJS/ML) (consolidated)

Dear Judge Lovric,

On February 6, 2024, your Honor entered a Text Order setting forth deadlines. ECF No. 378. For the reasons stated below, Defendants ETC Sunoco Holdings LLC and Energy Transfer (R&M), LLC (collectively, "Sunoco Defendants") and Honeywell International Inc. ("Honeywell") (together with Sunoco Defendants, "the Parties") write to request a modest adjustment to one deadline in the current schedule that will not impact the overall schedule.

The Parties have been working cooperatively through the discovery process. Honeywell noticed the Rule 30(b)(6) deposition of Sunoco Defendants on January 31, 2024; by agreement of the Parties the deposition was scheduled to proceed on July 25, 2024. Unfortunately, I am experiencing a family medical emergency and will be unavailable on July 25. I requested a one-week adjournment of the Rule 30(b)(6) deposition to begin on August 1, 2024. Honeywell has agreed to this request and the Parties intend to proceed with the deposition on that date.

Under the Text Order, the deadline for Honeywell to serve its Affirmative Expert Reports is August 9, 2024; the Parties request that Your Honor order a modest one-week extension of Honeywell's deadline to and through August 16, 2024. In support of this request, the Parties state

July 22, 2024
Page 2

that by accommodating Sunoco Counsel's reasonable request to reschedule the Rule 30(b)(6) deposition in light of the circumstances Honeywell will in turn have limited time to incorporate information obtained from Sunoco Defendants in the Rule 30(b)(6) deposition into its Affirmative Expert Reports. Accordingly, the Parties respectfully request that Your Honor amend the current deadline to permit Honeywell a similar one week extension to submit its Affirmative Expert Reports.

The Parties are not seeking adjustments to any of the remaining deadlines in the schedule set forth in Your Honor's Text Order, ECF No. 378, and the current deadlines for the close of fact and expert discovery and dispositive motions would remain as-is.

We thank you in advance for your consideration of Sunoco Defendants' and Honeywell's request.

Very truly yours,

A handwritten signature in blue ink, appearing to read "John J. McAleese, III", is positioned above the printed name.

John J. McAleese, III